



RECEIVED

JAN 08 109

Office of Enforcement
Compliance & Environmental
Justice

Administrator
Enforcement Division
Department of Environmental Quality
1520 E. Sixth Avenue
P. O. Box 200901
Helena, Montana 59620-0901

January 6, 2009

**DOCKET No.: HW-07-01
EAST HELENA SITE
QUARTERLY PROGRESS REPORT
OCTOBER 2008 - DECEMBER 2008
AND 2008 WORK PLAN COMPLETION REPORT**

Dear Administrator:

On October 2, 2007, Asarco and the Montana Department of Environmental Quality (Department) entered into an Administrative Order on Consent, Docket No. HW-07-01 (Order), to continue Asarco's cleaning and demolition program established under the 2005 Consent Decree. The Order requires Asarco to develop and implement yearly work plans for the removal, storage, and proper disposal or recycling of all remaining hazardous waste and/or secondary material located in process units, pollution control devices, and storage units and other identified areas of the East Helena Plant.

On March 12, 2008, Asarco submitted the 2008 Cleaning and Demolition Project Work Plan that described the management activities for calendar year 2008. On April 18, 2008, Asarco responded to the Department's April 9, 2008 letter that contained both the State of Montana and EPA comments on the Work Plan. In the April 18, 2008 response, Asarco notified the Department that approval of the Work Plan must occur by May 1, 2008 in order for the work outlined in the Work Plan to proceed in a timely manner.

On May 15, 2008, Asarco submitted responses to the Department's May 7, 2008 letter that contained a second set of comments on the Work Plan. On May 22, 2008, the Department conditionally approved the Work Plan providing that Asarco submit revised replacement pages to the original Work Plan that reflect the agreed upon modifications. On May 29, 2008, Asarco submitted a redlined and final version of the Work Plan.

On May 27, 2008, the Montana State Historic Preservation Office (SHPO) advised EPA, the Department, and Asarco that the applicable requirements of the National Historic Preservation Act will need to be examined prior to commencing the cleaning and

demolition work plan. The Department and EPA committed to review the applicability of the Act and the impact on implementing the Work Plan.

In a July 17, 2008 letter, EPA advised Asarco of the procedural requirements for historic structures located at the facility. On July 21, 2008, representatives from the SHPO, the Department, and Asarco participated in an initial walk through of the facility to begin the process.

Asarco's historic resources contractor (Arcadis) mobilized on July 28, 2008 during which Arcadis was provided site-specific training and a preliminary tour of affected facilities. On July 29, 2008, Arcadis began reviewing the applicable engineering drawings. Photographic recordation of the facility commenced on July 30, 2008.

On July 25, 2008, Asarco provided EPA with URS's revised timetable for the 2008 cleaning and demolition project and 2008 Interim Measures Work Plan Addendum. Asarco submitted to EPA an amended schedule on July 29, 2008. That same day, EPA provided Asarco with approval of the schedule.

On August 6, 2008, Asarco's historic resources contractor (Arcadis) submitted to EPA a revised proposal for historic recordation and context narrative that included 1) Attachment A of ancillary structures that are likely to be affected by the cleaning and demolition and 2) a historic recordation phase 1 deliverable outline.

In an August 15, 2008 letter, Asarco (through Arcadis) provided EPA, the Department, and the Montana State Historic Preservation officer with the photographs obtained during the photo documentation task performed at the East Helena facility. This submittal contained detailed photographic collection information (in the form of two compact diskettes) along with an updated Attachment A that referenced supporting engineering or measured drawings. The information contained in this submittal was the subject of an August 18, 2008 conference call with Asarco and the agencies. On August 19, 2008, EPA issued a letter that served as approval to commence the scheduled cleaning and demolition for calendar year 2008.

On August 26, 2008, Asarco provided EPA and the Department with an amended project schedule for completing the agreed upon cleaning and demolition tasks for the 2008 construction season. On September 10, 2008, EPA and the Department jointly approved the amended schedule.

Section 5.1 and 5.2 of the Work Plan requires Asarco to submit quarterly progress reports and an annual completion report to the Department that discuss the actions taken by Asarco under the Work Plan. The following report describes those activities that have occurred or are related to projects performed under the approved Work Plan from October 2008 through December 2008 and provides information to satisfy the annual completion report requirements.

5.1 Quarterly Reporting

a. A description of the portion of the Work Plan completed;

On October 24, 2008, Asarco notified the Department that the cleaning and demolition outlined in the 2008 Work Plan and 2008 Interim Measures Work Plan Addendum was complete. At that time, only the placement, backfilling, and contouring of fumed slag had yet to be finalized. These final tasks have been completed and the interim cap has been installed within the prescribed areas. As previously reported in the third quarter 2008 progress report, Asarco identified 30 adjacent or ancillary structures that were affected by the cleaning and demolition project. The demolition status of these structures is described in Attachment A.

b. Summaries of all deviations from the approved Work Plan during the reporting period;

There were no significant deviations from the approved Work Plan during the reporting period.

c. Summaries of all problems or potential problems encountered during the reporting period;

There were no problems or potential problems encountered during the reporting period.

d. Projected work for the next reporting period;

The projected work prescribed in the approved Work Plans is complete.

e. Documentation of all shipments of recyclable materials and hazardous wastes off-site including shipping papers such as manifests (if required);

There were 150 shipments of recyclable materials (unprepared scrap steel) that were shipped during the fourth quarter 2008. A copy of the scrap metal daily summary report for these shipments is attached to this quarterly progress report.

There were no off-site shipments of hazardous wastes associated with the 2008 Work Plans during the fourth quarter 2008. The waste material generated during the cleaning and demolition project was hauled directly to the CAMU Phase 2 cell. The following materials were hauled to the CAMU Phase 2 cell during the implementation of the Work Plans.

| Description of Material | Amount (Tons) |
|-------------------------------------|----------------------|
| Demolition Debris | 54,774 |
| Acid Plant Catalyst | 83 |
| Blast Furnace Baghouse Floor Debris | 19 |
| Blast Furnace Baghouse Bags | 27 |
| Monier and Blast Furnace Flue Dust | 272 |
| Dust Enclosure Baghouse Bags | 8 |

- f. **Description of each shipment of reclaimed or recycled material made during the preceding quarter indicating how the material is managed, handled, or treated for recovery or recycling that demonstrates that it has value. The information to be submitted to the Department in making a successful stewardship demonstration is (1) acceptance criteria required by the receiving facility (expressed as a minimum threshold of recoverable metals and maximum allowable toxic metals), (2) a demonstration that the receiving facility is in compliance with all applicable environmental requirements, (3) a copy of the contractual agreement between Asarco, its broker and the receiving facility, (4) the name of the state or provincial regulatory contact and facility contact.**

A description of the management of reclaimed or recycled material shipments conducted during calendar year 2008 has been provided in the 2008 third quarter progress report.

5.2 ANNUAL REPORTING

- a. **A description of the cleaning efforts conducted,**

Asarco completed the cleaning and demolition outlined in the approved Work Plans on or before December 31, 2008. The details of these cleaning and demolition efforts are discussed in detail within this progress report, the October 24, 2008 notification letter, and 2008 third quarter progress report.

- b. **If applicable, documentation of all shipments of recyclable materials and/or hazardous wastes,**

The documentation of recyclable materials was provided in the 2008 third quarter progress report and within this progress report. The Pacific Steel and Recycling purchase report for the scrap metal shipments performed in fourth quarter 2008 is attached to this annual completion report. There were no off-site shipments of hazardous wastes associated with the 2008 Work Plans.

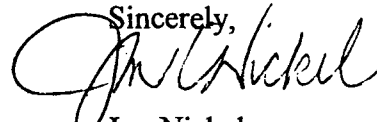
- c. **Summaries of all problems or potential problems encountered during the reporting period, and**

There were no problems encountered during the reporting period.

- d. **Certification that the Work Plan has been fully implemented.**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

If you should need any further explanation or assistance with the information contained in this quarterly progress report, please feel free to contact me.

Sincerely,

Jon Nickel

Cc: Linda Jacobson, RCRA Project Manager

**EAST HELENA SITE
QUARTERLY PROGRESS REPORT
OCTOBER 2008 - DECEMBER 2008**

Attachment A

Adjacent or adjoining structures that will be affected by cleaning and demolition project.

| Structure | Demolition Status |
|--|--|
| Blast Furnace Cooling Water Return Tanks | Demolition Complete |
| Pipefitter Storage Shed | Demolition Complete |
| Blacksmith Coke Storage Bin | Demolition Complete |
| Carpenter Shop | Demolition Complete |
| Former Paint Shop | Demolition Complete |
| Former Paint Storage Shed | Demolition Complete |
| Incinerator | Demolition Complete |
| Spray Drier Building with Fan and Stack | Demolition Complete |
| Truck Unloading Building | Demolition Complete |
| Acid Plant Cooling Towers with Chemical Storage Tanks | Demolition Complete |
| Sand Filter Building | Demolition Complete |
| Contractor Trailer | Demolition Complete |
| Instrument Storage Shed | Demolition Complete |
| Acid Plant Shop | Demolition Complete |
| Acid Plant Oil Shed | Demolition Complete |
| Acid Plant Decolorization Building with Sump | Demolition Complete |
| Overhead Acid Pipe Rack from Monier Flue to Pump Tank Building | Demolition Complete |
| Ringling Dust Building | URS Cleaned, Dismantled and Transferred Off-Site |
| Lime Storage Building | Demolition Complete |
| Air Receiver | Demolition Complete |
| Dust Handling System with Baghouse | Demolition Complete |
| Overhead Ventilation Pipe | Demolition Complete |
| Emission Monitoring Station with Support/Stack Fan | Demolition Complete |
| Overhead Dust Handling Pneumatic Transfer Pipe | Demolition Complete |
| Ore Storage Bins | Demolition Complete |
| Auto Shop | Demolition Complete |
| Pump Tank Building | Demolition Complete |
| Former Gunnite Storage Building | Demolition Complete |
| Weak Gas Handling Flue | Demolition Complete |
| Sinter Stack Fan | Demolition Complete |

**EAST HELENA SITE
QUARTERLY PROGRESS REPORT
OCTOBER 2008 - DECEMBER 2008**

SCRAP METAL DAILY SUMMARY REPORT



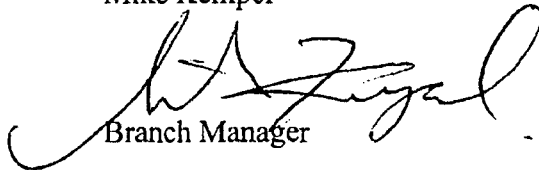
PACIFIC
STEEL & RECYCLING

11-25-08

Attn: Shaun O'Connor
Cleveland Wrecking

Here is the purchase report that you requested. This represents the purchases from 10-01-08 thru 10-16-08, invoices starting with 1140162 and ending with 1143492 for a total of 1,680,600 lbs.

Mike Kempel



Branch Manager

Stockbook Purchase Detail - Co - Item

company 00011 item number 4000 from 10/01/2008 to 11/27/2008 cust
908146

| co | draft | document | date | item | description | qty | uom |
|-------|-------|----------|------------|------|-------------|--------|-----|
| 00011 | AP | 1140162 | 10/09/2008 | 4000 | SCRAP IRON | 15,700 | LB |
| 00011 | AP | 1140166 | 10/09/2008 | 4000 | SCRAP IRON | 14,080 | LB |
| 00011 | AP | 1140207 | 10/09/2008 | 4000 | SCRAP IRON | 8,380 | LB |
| 00011 | AP | 1140208 | 10/09/2008 | 4000 | SCRAP IRON | 16,360 | LB |
| 00011 | AP | 1140214 | 10/09/2008 | 4000 | SCRAP IRON | 11,880 | LB |
| 00011 | AP | 1140216 | 10/09/2008 | 4000 | SCRAP IRON | 13,540 | LB |
| 00011 | AP | 1140217 | 10/09/2008 | 4000 | SCRAP IRON | 12,320 | LB |
| 00011 | AP | 1140218 | 10/09/2008 | 4000 | SCRAP IRON | 13,100 | LB |
| 00011 | AP | 1140232 | 10/09/2008 | 4000 | SCRAP IRON | 8,600 | LB |
| 00011 | AP | 1140233 | 10/09/2008 | 4000 | SCRAP IRON | 11,700 | LB |
| 00011 | AP | 1140235 | 10/09/2008 | 4000 | SCRAP IRON | 10,720 | LB |
| 00011 | AP | 1140236 | 10/09/2008 | 4000 | SCRAP IRON | 11,320 | LB |
| 00011 | AP | 1140237 | 10/09/2008 | 4000 | SCRAP IRON | 8,080 | LB |
| 00011 | AP | 1140241 | 10/09/2008 | 4000 | SCRAP IRON | 14,800 | LB |
| 00011 | AP | 1140243 | 10/09/2008 | 4000 | SCRAP IRON | 11,040 | LB |
| 00011 | AP | 1140245 | 10/09/2008 | 4000 | SCRAP IRON | 13,820 | LB |
| 00011 | AP | 1140247 | 10/09/2008 | 4000 | SCRAP IRON | 12,200 | LB |
| 00011 | AP | 1140248 | 10/09/2008 | 4000 | SCRAP IRON | 11,020 | LB |
| 00011 | AP | 1140251 | 10/09/2008 | 4000 | SCRAP IRON | 12,700 | LB |
| 00011 | AP | 1140762 | 10/10/2008 | 4000 | SCRAP IRON | 12,860 | LB |
| 00011 | AP | 1140764 | 10/10/2008 | 4000 | SCRAP IRON | 10,480 | LB |
| 00011 | AP | 1140765 | 10/10/2008 | 4000 | SCRAP IRON | 10,100 | LB |
| 00011 | AP | 1140766 | 10/10/2008 | 4000 | SCRAP IRON | 11,620 | LB |
| 00011 | AP | 1140767 | 10/10/2008 | 4000 | SCRAP IRON | 9,880 | LB |
| 00011 | AP | 1140768 | 10/10/2008 | 4000 | SCRAP IRON | 3,820 | LB |
| 00011 | AP | 1140769 | 10/10/2008 | 4000 | SCRAP IRON | 9,580 | LB |
| 00011 | AP | 1140770 | 10/10/2008 | 4000 | SCRAP IRON | 11,380 | LB |
| 00011 | AP | 1140778 | 10/10/2008 | 4000 | SCRAP IRON | 12,020 | LB |
| 00011 | AP | 1140795 | 10/10/2008 | 4000 | SCRAP IRON | 7,680 | LB |
| 00011 | AP | 1140796 | 10/10/2008 | 4000 | SCRAP IRON | 11,860 | LB |
| 00011 | AP | 1140799 | 10/10/2008 | 4000 | SCRAP IRON | 12,980 | LB |
| 00011 | AP | 1140818 | 10/10/2008 | 4000 | SCRAP IRON | 27,420 | LB |
| 00011 | AP | 1140820 | 10/10/2008 | 4000 | SCRAP IRON | 17,300 | LB |
| 00011 | AP | 1140821 | 10/10/2008 | 4000 | SCRAP IRON | 20,160 | LB |
| 00011 | AP | 1140827 | 10/10/2008 | 4000 | SCRAP IRON | 7,900 | LB |
| 00011 | AP | 1140837 | 10/10/2008 | 4000 | SCRAP IRON | 13,360 | LB |
| 00011 | AP | 1140838 | 10/10/2008 | 4000 | SCRAP IRON | 16,420 | LB |
| 00011 | AP | 1140839 | 10/10/2008 | 4000 | SCRAP IRON | 13,620 | LB |
| 00011 | AP | 1140840 | 10/10/2008 | 4000 | SCRAP IRON | 14,200 | LB |
| 00011 | AP | 1140841 | 10/10/2008 | 4000 | SCRAP IRON | 14,240 | LB |
| 00011 | AP | 1140843 | 10/10/2008 | 4000 | SCRAP IRON | 16,800 | LB |
| 00011 | AP | 1140844 | 10/10/2008 | 4000 | SCRAP IRON | 15,120 | LB |
| 00011 | AP | 1140847 | 10/10/2008 | 4000 | SCRAP IRON | 11,980 | LB |
| 00011 | AP | 1140849 | 10/10/2008 | 4000 | SCRAP IRON | 13,900 | LB |
| 00011 | AP | 1140851 | 10/10/2008 | 4000 | SCRAP IRON | 6,940 | LB |
| 00011 | AP | 1140854 | 10/10/2008 | 4000 | SCRAP IRON | 13,480 | LB |
| 00011 | AP | 1140866 | 10/10/2008 | 4000 | SCRAP IRON | 8,480 | LB |
| 00011 | AP | 1140867 | 10/10/2008 | 4000 | SCRAP IRON | 11,820 | LB |
| 00011 | AP | 1140869 | 10/10/2008 | 4000 | SCRAP IRON | 10,060 | LB |
| 00011 | AP | 1140871 | 10/10/2008 | 4000 | SCRAP IRON | 15,420 | LB |
| 00011 | AP | 1140872 | 10/10/2008 | 4000 | SCRAP IRON | 15,100 | LB |
| 00011 | AP | 1140873 | 10/10/2008 | 4000 | SCRAP IRON | 13,980 | LB |
| 00011 | AP | 1140876 | 10/10/2008 | 4000 | SCRAP IRON | 10,900 | LB |
| 00011 | AP | 1140877 | 10/10/2008 | 4000 | SCRAP IRON | 13,200 | LB |
| 00011 | AP | 1141499 | 10/13/2008 | 4000 | SCRAP IRON | 11,580 | LB |
| 00011 | AP | 1141501 | 10/13/2008 | 4000 | SCRAP IRON | 8,740 | LB |
| 00011 | AP | 1141504 | 10/13/2008 | 4000 | SCRAP IRON | 10,820 | LB |

11/25/2008

| | | | | | |
|-------|------------|------------|------|------------|-----------|
| 00011 | AP 1141505 | 10/13/2008 | 4000 | SCRAP IRON | 10,160 LB |
| 00011 | AP 1141506 | 10/13/2008 | 4000 | SCRAP IRON | 10,680 LB |
| 00011 | AP 1141507 | 10/13/2008 | 4000 | SCRAP IRON | 9,100 LB |
| 00011 | AP 1141508 | 10/13/2008 | 4000 | SCRAP IRON | 10,460 LB |
| 00011 | AP 1141510 | 10/13/2008 | 4000 | SCRAP IRON | 10,320 LB |
| 00011 | AP 1141511 | 10/13/2008 | 4000 | SCRAP IRON | 10,500 LB |
| 00011 | AP 1141514 | 10/13/2008 | 4000 | SCRAP IRON | 15,190 LB |
| 00011 | AP 1141515 | 10/13/2008 | 4000 | SCRAP IRON | 11,040 LB |
| 00011 | AP 1141516 | 10/13/2008 | 4000 | SCRAP IRON | 9,860 LB |
| 00011 | AP 1141517 | 10/13/2008 | 4000 | SCRAP IRON | 8,860 LB |
| 00011 | AP 1141518 | 10/13/2008 | 4000 | SCRAP IRON | 8,890 LB |
| 00011 | AP 1141519 | 10/13/2008 | 4000 | SCRAP IRON | 9,160 LB |
| 00011 | AP 1141522 | 10/13/2008 | 4000 | SCRAP IRON | 12,240 LB |
| 00011 | AP 1141523 | 10/13/2008 | 4000 | SCRAP IRON | 8,700 LB |
| 00011 | AP 1141525 | 10/13/2008 | 4000 | SCRAP IRON | 16,400 LB |
| 00011 | AP 1141528 | 10/13/2008 | 4000 | SCRAP IRON | 9,620 LB |
| 00011 | AP 1142468 | 10/15/2008 | 4000 | SCRAP IRON | 12,400 LB |
| 00011 | AP 1142470 | 10/15/2008 | 4000 | SCRAP IRON | 13,160 LB |
| 00011 | AP 1142476 | 10/15/2008 | 4000 | SCRAP IRON | 13,860 LB |
| 00011 | AP 1142477 | 10/15/2008 | 4000 | SCRAP IRON | 13,300 LB |
| 00011 | AP 1142478 | 10/15/2008 | 4000 | SCRAP IRON | 12,200 LB |
| 00011 | AP 1142480 | 10/15/2008 | 4000 | SCRAP IRON | 11,380 LB |
| 00011 | AP 1142481 | 10/15/2008 | 4000 | SCRAP IRON | 9,840 LB |
| 00011 | AP 1142482 | 10/15/2008 | 4000 | SCRAP IRON | 10,720 LB |
| 00011 | AP 1142484 | 10/15/2008 | 4000 | SCRAP IRON | 10,260 LB |
| 00011 | AP 1142487 | 10/15/2008 | 4000 | SCRAP IRON | 11,240 LB |
| 00011 | AP 1142497 | 10/15/2008 | 4000 | SCRAP IRON | 11,240 LB |
| 00011 | AP 1142498 | 10/15/2008 | 4000 | SCRAP IRON | 11,740 LB |
| 00011 | AP 1142500 | 10/15/2008 | 4000 | SCRAP IRON | 9,900 LB |
| 00011 | AP 1142501 | 10/15/2008 | 4000 | SCRAP IRON | 11,900 LB |
| 00011 | AP 1142502 | 10/15/2008 | 4000 | SCRAP IRON | 6,200 LB |
| 00011 | AP 1143321 | 10/16/2008 | 4000 | SCRAP IRON | 8,020 LB |
| 00011 | AP 1143322 | 10/16/2008 | 4000 | SCRAP IRON | 7,680 LB |
| 00011 | AP 1143323 | 10/16/2008 | 4000 | SCRAP IRON | 10,380 LB |
| 00011 | AP 1143324 | 10/16/2008 | 4000 | SCRAP IRON | 11,320 LB |
| 00011 | AP 1143327 | 10/16/2008 | 4000 | SCRAP IRON | 10,720 LB |
| 00011 | AP 1143328 | 10/16/2008 | 4000 | SCRAP IRON | 10,180 LB |
| 00011 | AP 1143330 | 10/16/2008 | 4000 | SCRAP IRON | 8,580 LB |
| 00011 | AP 1143332 | 10/16/2008 | 4000 | SCRAP IRON | 12,360 LB |
| 00011 | AP 1143334 | 10/16/2008 | 4000 | SCRAP IRON | 10,440 LB |
| 00011 | AP 1143336 | 10/16/2008 | 4000 | SCRAP IRON | 9,620 LB |
| 00011 | AP 1143337 | 10/16/2008 | 4000 | SCRAP IRON | 12,180 LB |
| 00011 | AP 1143338 | 10/16/2008 | 4000 | SCRAP IRON | 9,840 LB |
| 00011 | AP 1143339 | 10/16/2008 | 4000 | SCRAP IRON | 2,540 LB |
| 00011 | AP 1143341 | 10/16/2008 | 4000 | SCRAP IRON | 14,500 LB |
| 00011 | AP 1143342 | 10/16/2008 | 4000 | SCRAP IRON | 10,480 LB |
| 00011 | AP 1143343 | 10/16/2008 | 4000 | SCRAP IRON | 14,980 LB |
| 00011 | AP 1143346 | 10/16/2008 | 4000 | SCRAP IRON | 12,880 LB |
| 00011 | AP 1143349 | 10/16/2008 | 4000 | SCRAP IRON | 13,500 LB |
| 00011 | AP 1143353 | 10/16/2008 | 4000 | SCRAP IRON | 11,520 LB |
| 00011 | AP 1143353 | 10/16/2008 | 4000 | SCRAP IRON | 11,500 LB |
| 00011 | AP 1143360 | 10/16/2008 | 4000 | SCRAP IRON | 12,700 LB |
| 00011 | AP 1143362 | 10/16/2008 | 4000 | SCRAP IRON | 7,920 LB |
| 00011 | AP 1143363 | 10/16/2008 | 4000 | SCRAP IRON | 6,720 LB |
| 00011 | AP 1143364 | 10/16/2008 | 4000 | SCRAP IRON | 7,700 LB |
| 00011 | AP 1143365 | 10/16/2008 | 4000 | SCRAP IRON | 9,660 LB |
| 00011 | AP 1143366 | 10/16/2008 | 4000 | SCRAP IRON | 11,360 LB |
| 00011 | AP 1143370 | 10/16/2008 | 4000 | SCRAP IRON | 10,900 LB |
| 00011 | AP 1143373 | 10/16/2008 | 4000 | SCRAP IRON | 11,080 LB |
| 00011 | AP 1143376 | 10/16/2008 | 4000 | SCRAP IRON | 15,020 LB |
| 00011 | AP 1143378 | 10/16/2008 | 4000 | SCRAP IRON | 11,520 LB |
| 00011 | AP 1143382 | 10/16/2008 | 4000 | SCRAP IRON | 11,780 LB |
| 00011 | AP 1143385 | 10/16/2008 | 4000 | SCRAP IRON | 13,920 LB |
| 00011 | AP 1143386 | 10/16/2008 | 4000 | SCRAP IRON | 13,000 LB |

11/25/2008

| | | | | | |
|-------|------------|------------|------|------------|-----------|
| 00011 | AP 1143388 | 10/16/2008 | 4000 | SCRAP IRON | 11,840 LB |
| 00011 | AP 1143390 | 10/16/2008 | 4000 | SCRAP IRON | 18,900 LB |
| 00011 | AP 1143391 | 10/16/2008 | 4000 | SCRAP IRON | 10,220 LB |
| 00011 | AP 1143395 | 10/16/2008 | 4000 | SCRAP IRON | 10,060 LB |
| 00011 | AP 1143398 | 10/16/2008 | 4000 | SCRAP IRON | 9,980 LB |
| 00011 | AP 1143400 | 10/16/2008 | 4000 | SCRAP IRON | 7,780 LB |
| 00011 | AP 1143401 | 10/16/2008 | 4000 | SCRAP IRON | 10,700 LB |
| 00011 | AP 1143402 | 10/16/2008 | 4000 | SCRAP IRON | 10,060 LB |
| 00011 | AP 1143403 | 10/16/2008 | 4000 | SCRAP IRON | 7,920 LB |
| 00011 | AP 1143405 | 10/16/2008 | 4000 | SCRAP IRON | 6,980 LB |
| 00011 | AP 1143406 | 10/16/2008 | 4000 | SCRAP IRON | 8,660 LB |
| 00011 | AP 1143465 | 10/16/2008 | 4000 | SCRAP IRON | 15,120 LB |
| 00011 | AP 1143466 | 10/16/2008 | 4000 | SCRAP IRON | 16,020 LB |
| 00011 | AP 1143468 | 10/16/2008 | 4000 | SCRAP IRON | 16,180 LB |
| 00011 | AP 1143469 | 10/16/2008 | 4000 | SCRAP IRON | 16,940 LB |
| 00011 | AP 1143470 | 10/16/2008 | 4000 | SCRAP IRON | 3,620 LB |
| 00011 | AP 1143472 | 10/16/2008 | 4000 | SCRAP IRON | 7,760 LB |
| 00011 | AP 1143473 | 10/16/2008 | 4000 | SCRAP IRON | 7,960 LB |
| 00011 | AP 1143474 | 10/16/2008 | 4000 | SCRAP IRON | 10,180 LB |
| 00011 | AP 1143475 | 10/16/2008 | 4000 | SCRAP IRON | 4,920 LB |
| 00011 | AP 1143479 | 10/16/2008 | 4000 | SCRAP IRON | 10,340 LB |
| 00011 | AP 1143481 | 10/16/2008 | 4000 | SCRAP IRON | 6,740 LB |
| 00011 | AP 1143482 | 10/16/2008 | 4000 | SCRAP IRON | 4,900 LB |
| 00011 | AP 1143483 | 10/16/2008 | 4000 | SCRAP IRON | 8,140 LB |
| 00011 | AP 1143485 | 10/16/2008 | 4000 | SCRAP IRON | 8,240 LB |
| 00011 | AP 1143487 | 10/16/2008 | 4000 | SCRAP IRON | 5,160 LB |
| 00011 | AP 1143488 | 10/16/2008 | 4000 | SCRAP IRON | 4,180 LB |
| 00011 | AP 1143489 | 10/16/2008 | 4000 | SCRAP IRON | 7,060 LB |
| 00011 | AP 1143492 | 10/16/2008 | 4000 | SCRAP IRON | 8,480 LB |

1,680,600

11/25/2008